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Attn.:	Mail Stop Appeal Brief - Patents
Fax No.:	(571) 273-8300
From:	Michael E. Hudzinski
Re:	**Our Reference: SVL920010028US1** *(IBMZ 2 00010)* Serial No. 09/893,541; Filed June 28, 2001

Total Pages: 69 Including cover sheet

COMMENTS:

Supplemental

Appeal Brief

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE HONORABLE BOARD OF PATENT APPEALS AND INTERFERENCES

In re Application of: Cabanes, et al.

Application No.:   09/893,541   Examiner: Peng KE

Filed: June 28, 2001   Docket No.: SVL920010028US1

For: HEURISTIC KNOWLEDGE PORTAL

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TRANSMITTAL OF SUPPLEMENTAL APPEAL BRIEF UNDER 37 C.F.R. § 41.37
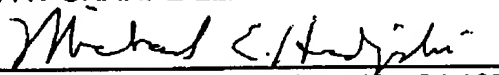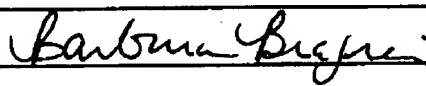
Dear Sir:

Applicants transmit herewith one (1) originally signed copy of the SUPPLEMENTAL APPEAL BRIEF UNDER 37 C.F.R. §41.37 for the above-identified patent application.

No fees are believed to be due. In the event, however, that any fees are due, applicants authorize the Commissioner to charge any fees which may be required, or credit ay overpayment to Deposit Account No. 06-0308. If there are any additional fees required by this communication, please charge same to Deposit Account No. 06-0308.

Respectfully submitted,
FAY SHARPE LLP

[signature]

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PATENT APPLICATION

THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE HONORABLE BOARD OF PATENT APPEALS AND INTERFERENCES

In re the Application of

Alex CABANES, et al.

Application No.: 09/893,541   Examiner: Peng Ke

Filed: June 28, 2001   Docket No.: SVL920010028US1

For: HEURISTIC KNOWLEDGE PORTAL

SUPPLEMENTAL

BRIEF ON APPEAL

Appeal from Group

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Application No. 09/893,541

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Application No. 09/893,541

I. REAL PARTY IN INTEREST

The real party in interest is International Business Machines Corporation by way of an Assignment recorded in the U.S. Patent and Trademark Office on June 28, 2001 at Reel 011953, Frame 0251.

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Application No. 09/893,541

II.   RELATED APPEALS AND INTERFERENCES

There are no prior or pending appeals, interferences or judicial proceedings, known to Appellants, Appellants' representative, or assignee, that may be related to, or which will directly affect or be directly affected by or have a bearing upon the Board's decision in the pending Appeal.

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Application No. 09/893,541

III.   STATUS OF CLAIMS

Claims 1-8, 10-12, 14-22, 24-26, and 28-44 are on appeal.

Claims 1-8, 10-12, 14-22, 24-26, and 28-44 are pending.

None of the claims have been allowed.

None of the claims were objected to only for being dependent from a rejected base claim, but are otherwise allowable.

Claims 1-8, 10-12, 14-22, 24-26, and 28-44 are rejected.

None of the claims have been withdrawn from consideration.

Claims 9, 13, 23 and 27 have been canceled.

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Application No. 09/893,541

IV.   STATUS OF AMENDMENTS

No Amendment After Final Rejection has been filed which would have proposed amendments to the claims.

A Response (After Final Rejection) was filed on November 03, 2006 in which Appellants made arguments but no claim amendments were proposed.

In an Advisory Action mailed on December 05, 2006 the Office contended that the request for reconsideration does not place the application in condition for allowance because, according to the Examiner, the cited prior art of record renders the claimed invention unpatentable.

A Notice of Appeal was filed on January 09, 2007.

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V.   SUMMARY OF CLAIMED SUBJECT MATTER

In accordance with one embodiment such as set out in <u>independent claim 1</u>, a user interface method is provided (p. 6, l. 7-15) for executing one or more operations in a computer for interfacing an associated user with a knowledge portal that is operatively associated with a plurality of data objects.   The user interface method comprises: displaying in a document pane (FIG. 2, 72)(p. 20, l. 5-7) at least a portion of first contents of a current object (p. 20, l. 7-10); displaying in a map pane a K-map (FIG. 2, 74) indicating objects which are cataloged in the knowledge portal as including second contents related to a selected K-map object; and displaying in a preview pane third contents (FIG. 4, 262) associated with a preview object (FIG. 4, 260) selected from the K-map, wherein the document pane, map pane, and preview pane are displayed simultaneously on a single display device (p. 14, l. 1-7).   The user interface method further comprises receiving a user input (FIG. 4, 202); updating, based upon the received user input, at least one of a first identify of said current object, a second identity of said preview object, and a K-map parameter (p. 19, l. 4-8); and updating the K-map conditional upon the updating of a K-map parameter (p. 20, l. 4-8).

In further accordance therewith, such as set out in <u>dependent claim 2</u>, the updating, based upon the received user input, at least one of a current object identity, a preview object identity, and a K-map parameter, includes: updating the K-map view selector based upon the received user input (p. 19, l. 9-16) (FIG. 4, 202, 210) to correspond to a node view (p. 6, l. 16-18), and the displaying in a map pane the K-map includes displaying a non-hierarchical node view (FIG. 3B) of the K-map (p. 6, l. 18-21).

In further accordance therewith, such as set out in <u>dependent claim 3</u>, the updating, based upon the received user input, at least one of a current object identity, a preview object identity, and a K-map parameter, includes: updating the K-map class selector value based upon the received user input (p. 6, l. 22 – p. 7, l. 1) (p. 18, l. 10-16), and the updating a K-map (FIG. 4, 224) conditional upon updating a K-map parameter includes updating the K-map to include objects corresponding to the K-map class selector value (p. 7, l. 1-4).

In further accordance therewith, such as set out in <u>dependent claim 4</u>, the updating a K-map class selector value includes updating the K-map selector value to correspond to one of a people class, a places class, and a things class (FIG. 3B, 126) based upon the received user input (p. 7, l. 4-6) (p. 8, l. 13) (FIG. 4, 202, 220, 222, 224).

In further accordance therewith, such as set out in <u>dependent claim 5</u>, the updating, based upon the received user input, at least one of a current object identity, a preview object identity, and a K-map parameter, includes: updating the K-map scope based upon the received user input (p. 7, l. 7-9), and the updating a K-map conditional upon updating a K-map parameter includes updating the K-map (FIG. 4, 234) to include objects which are cataloged in the knowledge portal (p. 7, l. 9-11) as including fourth contents relating to the K-map object and having a strength of relationship respective to the K-map object within the updated K-map scope.

In further accordance therewith, such as set out in <u>dependent claim 6</u>, the receiving a user input includes receiving a selection of an updated current object identity from the user through the K-map pane (FIGS. 2, 3A, 3B), the updated current object identity being one of the objects indicated in the map pane (p. 7, l. 12-13). Further, the updating, based on the received user input, at least one of the current object identity, the preview object identity, and a K-map parameter includes updating the K-map object to correspond with the updated current object (p. 7, l. 13 – p. 7, l. 15). Also, the updating a K-map conditional upon updating a K-map parameter includes updating the K-map to include objects which are cataloged in the knowledge portal (p. 7, l. 9 - p. 7, l. 11) as including fourth contents related to the updated current object.

In further accordance therewith, such as set out in <u>dependent claim 7</u>, the step of receiving a user input includes receiving a selection of an updated preview object identity from the user through the K-map pane, the selected object identity being one of the objects indicated in the map pane, the method further comprising: displaying in the preview pane third contents associated with the updated preview object without changing the displaying in the document panel (p. 8, l. 3 – p. 8, l. 5) (FIG. 2).

In further accordance therewith, such as set out in <u>dependent claim 8</u>, the receiving a user input includes receiving a text entry through user highlighting of text in the document display pane (p. 7, l. 18 – p. 7, l. 19); the updating, based upon the

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received user input, at least one of a current object identity, a preview object identity, and a K-map parameter includes updating the K-map object to correspond with the received text entry (p. 7, l. 19 – p. 7, l. 22); and the updating a K-map conditional upon updating a K-map parameter includes updating the K-map to include objects which are cataloged in the knowledge portal as including fifth content related to the selected text (p. 7, l. 22 – p. 8, l. 2).

In further accordance therewith, such as set out in <u>dependent claim 40</u>, the preview pane (FIGS. 1 & 2, 76) third contents associated with the updated preview object and displayed in the preview pane are metadata stored in the knowledge portal (FIG. 1, 10) rather than in the preview object itself.

In further accordance therewith, such as set out in <u>dependent claim 42</u>, the K-map parameter includes at least one of a scope (p. 7, l. 9) (FIG. 4, 230), a view selector (p. 6, l. 18) (FIG. 4, 210), a class selector (p. 7, l. 1) (FIG. 4, 220), and a K-map object parameter (p. 7, l. 21-22) (FIG. 1, 84) (FIG. 4, 240).

In accordance with another embodiment such as set out in <u>independent claim 10</u>, an apparatus is provided (p. 8, l. 6-11) for executing one or more operations in a computer for interfacing an associated user with a knowledge portal operatively associated with a plurality of data objects. The apparatus comprises a computer having a data store coupled thereto (FIG. 1, 12), wherein the data store stores the plurality of data objects, and one or more computer programs (FIG. 1, 14, 16, 18, 20, 22 and 24). The programs are performed by the computer for: receiving a user input (FIG. 4, 202), updating, based upon the received user input, at least one of a current object identity, a preview object identity, and a K-map parameter (p. 19, l. 4-8). The computer programs may also be performed for updating a K-map conditional upon updating a K-map parameter (p. 20, l. 4-8); displaying in a document pane at least a portion of first contents of the current object (FIG. 4, 272), displaying in a map pane the K-map (FIG. 4, 276); and displaying in a preview pane second contents associated with the preview object (FIG. 4, 262).

In further accordance therewith, such as set out in <u>dependent claim 11</u>, the updating, based upon the received user input, at least one of a current object identity, a preview object identity, and a K-map parameter, includes: updating the K-map view

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selector based upon the received user input (p. 6, l. 16-18), the K-map view selector having at least a node view selection option and a tree view selection option; and the displaying in a map pane the K-map includes selectively displaying one of a tree view and a node view of the K-map based upon the setting of the K-map view selector (p. 6, l. 18-21).

In further accordance therewith, such as set out in <u>dependent claim 12</u>, the updating, based upon the received user input, at least one of a current object identity, a preview object identity, and a K-map parameter, includes: updating the K-map class selector value based upon the received user input (p. 6, l. 22 – p. 7, l. 1), the class selector including at least a people class selection option, a places class selection option, and a things class selection option; and the updating a K-map conditional upon updating a K-map parameter includes updating the K-map to include objects corresponding to the K-map class selector value (p. 7, l. 1-7).

In further accordance therewith, such as set out in <u>dependent claim 14</u>, the updating, based upon the received user input, at least one of a current object identity, a preview object identity, and a K-map parameter, includes: updating the K-map scope based upon the received user input (p. 7, l. 7-9); and the updating a K-map conditional upon updating a K-map parameter includes updating the K-map to include objects within the K-map scope (p. 7, l. 9-11).

In further accordance therewith, such as set out in <u>dependent claim 15</u>, the receiving a user input includes: receiving a selection of the current object identity from the user through the K-map pane (p. 7, l. 12-13); and the updating a K-map conditional upon updating a K-map parameter includes: updating the K-map to include objects related to the current object (p. 7, l. 13-15).

In further accordance therewith, such as set out in <u>dependent claim 16</u>, the receiving a user input includes receiving a selection of the preview object identity from the user through the K-map pane (p. 7, l. 16-17).

In further accordance therewith, such as set out in <u>dependent claim 17</u>, the receiving a user input includes receiving a text entry supplied through user highlighting of text in the document display pane (p. 7, l. 18-19); the updating, based upon the received user input, at least one of a current object identity, a preview object identity,

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and a K-map parameter, includes: updating an object K-map parameter to correspond with the received text entry (p. 7, l. 19-22); and the updating a K-map conditional upon updating a K-map parameter includes updating the K-map to include objects related to the selected text (p. 7, l. 22 – p. 8, l. 2).

In further accordance therewith, such as set out in <u>dependent claim 18</u>, the apparatus further simultaneously displays the document pane (FIG. 1, 72), the map pane (FIG. 1, 74), and the preview pane (FIG. 1, 76) on a single display device (p. 7, l. 3-5) (FIG. 2).

In further accordance therewith, such as set out in <u>dependent claim 43</u>, the K-map parameter includes at least one of a scope (p. 7, l. 9) (FIG. 4, 230), a view selector (p. 6, l. 18) (FIG. 4, 210), a class selector (p. 7, l. 1) (FIG. 4, 230), and a K-map object parameter (p. 7, l. 21-22) (FIG. 1, 84) (FIG. 4, 240).

In accordance with another embodiment such as set out in <u>independent claim 19</u>, an article of manufacture is provided (p. 8, l. 12-18) comprising a program storage medium readable by a computer and embodying one or more instructions executable by the computer to perform a method for executing an operation to perform a user interface method for interfacing an associated user with a knowledge portal operatively associated with a plurality of data objects. The method comprises generating a knowledge portal catalog cataloging data objects (FIG. 1, 30) based on content, the knowledge portal contextually linking the objects based on document content (p. 12, 10-14); and displaying in a document pane at least a portion of first contents of a current object (FIG. 4, 272). The method also includes constructing a K-map identifying related objects having second contents related to a K-map object as measured by a strength of relationship between the related object and the K-map object (p. 18, l. 1-9). The method further includes displaying in a map pane the K-map (FIG. 4, 276); and displaying in a preview pane third contents associated with a preview object selected from the related objects (FIG. 4, 258), the preview pane being displayed simultaneously with the document pane and the map pane (p. 14, l. 1-7).

In further accordance therewith, such as set out in <u>dependent claim 20</u>, the displaying in a map pane the K-map includes displaying a node view (FIG. 3B) of the K-

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map limited to related objects having a strength of relationship respective to the K-map object greater than a specified value (p. 9, l. 16-22) (p. 18, l. 1-9).

In further accordance therewith, such as set out in <u>dependent claim 21</u>, the displayed K-map includes objects corresponding to a user-selectable K-map class selector value (p. 8, l. 22 – p. 9, l. 2) (FIG. 4, 224).

In further accordance therewith, such as set out in <u>dependent claim 22</u>, the K-map selector value corresponds to one of a people class, a places class, and a things class (p. 9, l. 13-15).

In further accordance therewith, such as set out in <u>dependent claim 24</u>, the method further includes: receiving a selection of an updated current object identity from the user through the K-map pane (p. 7, l. 7-9); constructing an updated K-map that includes objects related to the updated current object (p. 6, l. 12); displaying at least a portion of fourth contents of the updated current object in the document pane (p. 6, l. 12-14); and displaying the updated K-map in the map pane (p. 6, l. 14-15).

In further accordance therewith, such as set out in <u>dependent claim 25</u>, the method further includes receiving a selection of the preview object identity from the user through the K-map pane (p. 10, l. 5-8).

In further accordance therewith, such as set out in <u>dependent claim 26</u>, the method further includes receiving a text entry supplied through user highlighting of text (FIG. 4, 250) in the document display pane (p. 8, l. 21-22); and updating the K-map to include objects related to the selected text (p. 8, l. 22-23).

In further accordance therewith, such as set out in <u>dependent claim 41</u>, the method further includes: updating the K-map object to correspond to one of a group consisting of: (i) a double-clicked K-map entry, (p. 18, l. 22) (FIG. 4, 260) (ii) text in the document pane that is highlighted by a user, (p. 18, l. 19) (FIG. 4, 250) and (iii) one or more search terms entered by a user (p. 19, l. 1) (FIG. 4, 240); and updating the displayed K-map to identify at least (i) related objects having fourth contents related to the updated K-map object, and (ii) a measure of a strength of relationship between each related object and the updated K-map object (p. 14, l. 11-12).

In accordance with another embodiment such as set out in <u>independent claim 28</u>, a user interface is provided (p. 8, l. 19 – p. 9, l. 2) for interfacing an associated user with

a knowledge portal that is operatively associated with a plurality of data objects and contextually links the objects based on document content. The user Interface comprises a means for receiving a user input (FIG. 4, 202) and a K-map processor for calculating a K-map corresponding to a current object and a set of K-map parameters (FIG. 1, 84), the K-map identifying objects indicated by a catalog (FIG. 1, 30) of the knowledge portal as having first contents related to the current object. The user Interface further comprises a current object display pane for displaying at least a portion of second contents of the current object (FIG. 1, 72); a K-map display pane for displaying the K-map (FIG. 1, 74); and a preview pane different from the current object display pane for displaying third contents corresponding to a preview object (FIG. 1, 76).

In further accordance therewith, such as set out in <u>dependent claim 29</u>, the K-map display pane displays the K-map in a non-hierarchical node view (p. 9, l. 3-7) (FIG. 3B).

In further accordance therewith, such as set out in <u>dependent claim 30</u>, the K-map processor calculates a K-map containing objects limited to objects corresponding to the K-map class parameter (p. 9, l. 8-10).

In further accordance therewith, such as set out in <u>dependent claim 31</u>, the means for receiving a user input include a pointing device selection means (FIG. 1, 68) operative at least within the K-map display pane (p. 9, l. 10-12); and the class parameter is selectively updateable by the user via the pointing device selection means operating on a graphical class input dialog (p. 9, l. 12-13).

In further accordance therewith, such as set out in <u>dependent claim 32</u>, the class parameter selectively takes values (FIG. 4, 220) Including a people class value, a places class value, and a things class value (p. 9, l. 13-15).

In further accordance therewith, such as set out in <u>dependent claim 33</u>, the K-map processor calculates a K-map containing objects limited to objects whose relationship to the current object falls within the K-map scope parameter value (p. 9, l. 16-18).

In further accordance therewith, such as set out in <u>dependent claim 34</u>, the means for receiving a user input include a pointing device selection means (FIG. 1, 68) operative at least within the K-map display pane (p. 9, l. 18-20); and the scope

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parameter is selectively updateable by the user via the pointing device selection means operating on a graphical scope input dialog (p. 9, l. 20-22) (FIG. 3B, 120).

In further accordance therewith, such as set out in <u>dependent claim 35</u>, the graphical scope input dialog is a slider bar (p. 9, l. 22) (FIG. 3B, 120).

In further accordance therewith, such as set out in <u>dependent claim 36</u>, the means for receiving a user input include a pointing device selection means (FIG. 1, 68) operative at least within the K-map display pane (p. 10, l. 1-2); and the current object is selectively updateable by the user via the pointing device selection means (FIG. 1, 68) operating within the K-map display pane (p. 10, l. 2-4).

In further accordance therewith, such as set out in <u>dependent claim 37</u>, the means for receiving a user input include a pointing device selection means (FIG. 1, 68) operative at least within the K-map display pane (p. 10, l. 5-6); and the preview object is selectively updateable by the user via the pointing device selection means operating within the K-map display pane, the updating of the preview object not affecting the current display pane (p. 10, l. 6-8).

In further accordance therewith, such as set out in <u>dependent claim 38</u>, the set of K-map parameters includes an object parameter, said object parameter being selectively updateable by the user (p. 10, l. 9-10); and the K-map processor calculates a K-map containing objects related to the object corresponding to the object parameter (p. 10, l. 10-11).

In further accordance therewith, such as set out in <u>dependent claim 39</u>, the means for receiving a user input include a pointing device selection means (FIG. 1, 68) operative at least within the document display pane (FIG. 1, 64) whereby the user selectively updates the object parameter by selecting text corresponding thereto from the second contents of the object display pane (p. 10, l. 12-15).

In further accordance therewith, such as set out in <u>dependent claim 44</u>, the set of K- map parameter includes at least one of a scope (p. 7, l. 9) (FIG. 4, 230), a view selector (p. 6, l. 18) (FIG. 4, 210), a class selector (p. 7, l. 1) (FIG. 4, 220), and a K-map object parameter (p. 7, l. 21-22) (FIG. 1, 84) (FIG. 4, 240).

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VI.   GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

The following grounds of rejection are presented for review:

Claims 1-8, 10-12, 14-22, 24-26, and 28-44 stand rejected under 35 U.S.C. §102(e) as anticipated by U.S. Patent No. 6,499,026 issued to Rivette et al. (hereinafter "Rivette").

The issues presented on Appeal are as follows:

1.   Whether claims 1-8, 40 and 42 are unpatentable under 35 U.S.C. §102(e) over Rivette.

2.   Whether claims 10-12, 14-18 and 43 are unpatentable under 35 U.S.C. §102(e) over Rivette;

3.   Whether claims 19-22, 24-26 and 41 are unpatentable under 35 U.S.C. §102(e) over Rivette; and

4.   Whether claims 28-39 and 44 are unpatentable under 35 U.S.C. §102(e) over Rivette.

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VII.   ARGUMENT

A.   Prosecution Background

In an Office Action dated July 6, 2004, claims 1-34 and 36-39 were rejected under 35 USC §102(e) as being anticipated by U.S. Patent No. 6,691,282 issued to Rochford et al. (hereinafter "Rochford"). Claim 35 was rejected under 35 USC 103(a) In view of Rochford.

Applicants responded to the Office action dated July 6, 2004 in a paper dated October 6, 2004. In that paper, claims 1-8, 19-22, 24-26, 28-29, and 37 were amended to further clarify aspects of the invention related to cataloged objects in the knowledge portal, and to correct matters of form. New dependent claims 40 and 41 were added to claim aspects of the invention related to storing metadata in the knowledge portal and updating the K-map. Claims 9 and 27 were cancelled.

In an Office Action dated March 7, 2005, which was made final, claims 1, 3, 4, 6-8, 10-18, 28-34, 36, 38, and 39 were rejected under 35 USC §102(e) as being anticipated by Rochford. Claim 35 was rejected under 35 USC §103(a) as being unpatentable over Rochford. Claims 2, 5, 19, 20, 24-26, and 41 were rejected under 35 USC § 103(a) as being unpatentable over Rochford in view of Sklar et al., U.S. Patent No. 5,790,121 (hereinafter "Sklar"). Claims 21 and 22 were rejected under 35 USC §103(a) as being unpatentable over Rochford in view of Sklar in further view of Novik, U.S. Patent No. 6,339,745 (hereinafter "Novik"). Claims 37 and 40 were rejected under 35 USC §103(a) as being unpatentable over Rochford in view of Novik.

On June 7, 2005, Applicants submitted a Request for Continued Examination in conjunction with a paper that responded to the Office Action dated March 7, 2005. In that paper, dependent claims 11-12, 19 and 28 were insubstantially amended to further clarify aspects of the invention and to correct matters of form. Claims 13 and 23 were cancelled.

In an Office Action dated March 6, 2006, claims 1-8, 10-12, 14-22, 24-26 and 28-41 were rejected under 35 USC §102(e) as being anticipated by U.S. Patent No.

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6,499,026 issued to Rivette et al. (hereinafter "Rivette"). It should be noted that even though the claim amendments in the Office Action dated June 7, 2005 were not substantive in nature, the Examiner abandoned rejections based on Rochford, Sklar and Novik in favor of the 35 USC §102(e) rejections based on the newly cited patent of Rivette. Essentially, the Examiner did not apply any of the Rockford, Sklar, or Novak prior art patents as being relevant to the patentability of the pending claims.

Applicants responded to the Office action dated March 6, 2006 in a paper dated May 31, 2006. In that paper, claims 1-8, 10-12, 14-17, 19-20, 30, 33, and 39-41 were amended to correct matters of form. New dependent claims 42-44 were added to claim aspects of the invention related to K-map parameters.

In an Office Action dated August 8, 2006, which was made final, claims 1-8, 10-12, 14-22, 24-26, and 28-41 were rejected under 35 USC §102(e) as being anticipated by Rivette. Once again, the Examiner did not apply of the Rockford, Sklar, or Novak prior art patents as being relevant to the patentability of the pending claims.

Applicants responded to the Office action dated August 9, 2006 in a paper dated November 3, 2006. In that paper, no claims were amended, added or cancelled.

In an Advisory Action dated December 5, 2006, Applicants were notified that the reply dated November 3, 2006 failed to place the present application in condition for allowance.

Accordingly, Applicants filed a Notice of Appeal dated January 16, 2007 and the current paper corresponds to that Notice of Appeal.

B.   Each Claim is Separately Patentable

Appellants contest the rejection of claims 1-8, 10-12, 14-22, 24-26, and 28-44 as being anticipated under 35 U.S.C. §102(e) by U.S. Patent No. 6,499,026 issued to Rivette et al. Each pending claim stands or falls separately. More particularly, each of the following claims constitute a separate group: 1, 2, 3, 4, 5, 6, 7, 8, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, 21, 22, 24, 25, 26, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, and 44; and, they stand as separately patentable claims.

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C.   All Pending Claims are Patentable Over Rivette

As stated above, claims 1-8, 10-12, 14-22, 24-26, and 28-44 stand rejected under 35 U.S.C. §102(e) as being anticipated by Rivette.

Anticipation requires the disclosure of each and every limitation of a claimed invention in a single piece of prior art. Apple Computer, Inc. v. Articulate Sys., Inc., 234 F.3d 14, 20 (Fed. Cir. 2000), Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). In addition to the prior art reference disclosing all of the claimed elements in isolation, anticipation requires the prior art reference to disclose each and every element in the claimed invention arranged as in the claim. Lindemann Maschinenfabrik Gmbh v. American Hoist & Derrick Co., 730 F.2d 1452, 221 USPQ 481 (Fed. Cir. 1984). Anticipation also requires that the prior art reference be enabling and accessible to the public. Akzo N.V. v. U.S. Int'l Trade Comm'n, 808 F.2d 1471, 1 USPQ 2d. 1241 (Fed Cir. 1986). The discussion below will show that the Examiner has not made a prima facie case of anticipation with respect to any of claims 1-8, 10-12, 14-22, 24-26, and 28-44.

The present application relates to knowledge management, and more particularly to knowledge portals. Knowledge portals, allow for the organizing and accessing knowledge contained in objects.

In one embodiment, the objects are documents comprising textual data. Knowledge portals, as contemplated by the present application, support contextual searching, whereby relevant documents are easily located by the user following a heuristic search path of content-based links. Accordingly, when accessing knowledge and information using a knowledge portal, the user is not required to have a prior understanding of the hierarchical structure (e.g., file system directory structure) in which the objects are stored in order to locate pertinent information of the relevant documents. Rather, documents are linked contextually based upon the document content, thereby enabling heuristic searching by a user. A particular document's knowledge map (or "K-map") is a rendering of linkages between the document and other relevant documents. Embodiments of the present application allow for simultaneous viewing of a document, its associated K-map comprising relevant objects, and a summary view of contents of relevant documents. This simultaneous displaying of the document, its

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K-map, and summary view of the relevant documents, is extremely convenient when carrying out a heuristic search, as the user does not need to constantly switch back and forth between the K-map view, document view, and view of the relevant documents' contents.

Rivette, on the other hand, is directed to a system, method, and computer program product for processing patent data. Specifically, as described with reference to FIG. 2, Rivette describes the processing of patent information 204. Accordingly, the processing performed by the invention is said to be "patent-centric" or "patent-specific." The system in Rivette maintains first databases of patents, and second databases of non-patent information of interest to a corporate entity (col. 11, l. 15-24). The system also maintains one or more groups. Each of the groups comprises any number of the patents from the first databases. The system, upon receiving appropriate operator commands, automatically processes the patents in one of the groups in conjunction with non-patent information from the second databases. Accordingly, the system performs patent-centric and group-oriented processing of data (col. 1, l. 23-27, col. 73, l. 39-49).

Additionally, Rivette does describe mapping of patents, but the discussion focuses on mapping relationships between patents based merely on forward and backward citations of patents--i.e., if a particular patent is citing an older patent as a reference, that is a backward citation, whereas if the particular patent is being cited by a newer application or patent as a reference, that is a forward citation.

The discussion below further analyzes the significant differences between Rivette and the Appellants' application.

D.   Claim 1 is Not Anticipated by Rivette

Independent claim 1 includes limitations not taught in Rivette including a limitation for displaying in a document pane at least a portion of first contents of a current object, displaying in a map pane a K-map indicating objects which are cataloged in the knowledge portal as including second contents related to a selected K-map object, and displaying in a preview pane third contents associated with a preview object selected from the K-map, wherein the document pane, map pane, and preview pane are displayed simultaneously on a single display device.

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The Office Action rejects claim 1 based partially on Figure 117, item 11706, and col. 113, line 65 through col. 115, line 27 of Rivette. The Office Action interprets the "document window" of Rivette (item 11706) as allegedly corresponding to the document pane of the present application. It should first be pointed out that the document pane of the present application, as described from page 15, line 21 through page 16, line 4, and as recited in the subject claim, as amended, displays <u>content</u> of the current object. For example, in the case of text objects, the actual text is displayed. For non-text objects, the content is preferably displayed in a format suitable for the object. As a visual example, Figure 2 shows actual text from an exemplary text document. Rivette, on the other hand, teaches utilizing the document window (item 11706) for displaying a list of "file titles" rather than "object or file contents" as described in col. 114, lines 22-40 and lines 58-67. In particular, Rivette describes the patents and other documents as being listed in a tabular or "spreadsheet" format (lines 25-26).

As an example, Rivette shows an exemplary listing of a single patent (U.S. Patent No. 5,029,013) in the document window displayed in Figure 133. Note that none of the content of the exemplary patent is shown in the document window, or elsewhere in the figure. Nor does Rivette teach or fairly suggest displaying patent or other document content in the document window. In fact, to the contrary, Rivette teaches displaying the patent or document content in another separate window as described in col. 115, lines 8-15, and shown in Figures 123-124. Rivette describes showing text of a selected patent in a text window, and an image of the selected patent in an image window, where the operator may view the text and image windows either separately, or simultaneously. However, Rivette does not teach displaying either the text window or the image window simultaneously with, or included within, the document window. On the other hand, as described above, Claim 1 of the present application recites a limitation wherein the document pane (which displays content of the object), map pane, and preview pane are displayed simultaneously on a single display device. Although the Office Action, on page 3, makes reference to Figure 117 of Rivette as an example of the document pane, map pane, and preview pane being displayed simultaneously, as described above with reference to similar Figure 133, the document window of Rivette does not display content of patents or other documents.

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Further, with continued reference to <u>claim 1</u>, the Office Action makes reference to col. 120, lines 8-62 of Rivette as allegedly corresponding to the recited limitations of claim 1 for updating at least one of the current object identity, the preview object identity, and a K-map parameter. However, claim 1, as amended, recites updating, based upon the received user input, at least one of the current object identity, the preview object identity, and a K-map parameter. As described in the specification of the present application (page 14, lines 11-15, page 18, lines 3-14, and page 20, lines 4-10), the K-map parameters preferably determine the range of objects included in the K-map. However, the above-mentioned parameters recited in the subject claim determine the range of objects to be included in a manner neither taught nor suggested in Rivette. For example, the scope parameter restricts contents of the K-map based on a strength of relationship; the view selector preferably selects between a node view and a tree view; the class selector limits objects to a specific class, e.g. people, places or things; and the object parameter constructs the K-map according to, e.g. keywords. It should be noted that the scope parameter is user adjustable as described on page 18, lines 2-4, preferably by means of a "Scope" slider bar. The only apparent strength of relationship mentioned in Rivette relates to the number of links between one note to another which is not a user-selectable measure of strength.

It is respectfully submitted, therefore, that the Rivette patent does not teach each and every element of claim 1. For at least the above-stated reasons, it is respectfully submitted that independent claim 1, and is patentably distinct and unobvious over the art of record.

Claims 2-8, 40 and 42 depend from claim 1.

1.   Claim 2 is Not Anticipated by Rivette

Claim 2 recites a user interface method according to claim 1, wherein the updating, based upon the received user input, at least one of a current object identity, a preview object identity, and a K-map parameter, includes updating the K-map view selector based upon the received user input to correspond to a node view; and the

displaying in a map pane the K-map includes displaying a non-hierarchical node view of the K-map.

The Examiner has cited the drawings at Figure 122, item 12204, and the specification at col. 120, l. 8-62 for a teaching of updating, based upon the received user input, at least one of a current object identity, and a preview object identity. Further, the Examiner cites Figure 164, item 16412 and col. 129, l. 64- col. 130, l. 30 for showing a K-map parameter including updating the K-map view selector based upon the received user input to correspond to a node view.

Appellants respectfully disagree. While this section of Rivette describes a patent citation module 1004 performing a patent citation tree function, there is no discussion of "updating a K-map view selector" as recited in claim 2. Rather, this section of Rivette merely suggests that particular nodes within the view (i.e., patent citation tree) may be selected, not a parameter that controls a K-map view. Therefore Rivette does not teach "updating the K-map view selector based upon the received user input to correspond to a node view" as recited in claim 2.

Still further, the Examiner has cited Figure 164 and the displaying in a map pane the K-map includes displaying a non-hierarchical node view of the K-map. Appellants respectfully disagree. This section of Rivette clearly describes a hierarchical node view and there is no suggestion that Rivette provides a "non-hierarchical node view of the K-map" as recited in claim 2.

It is respectfully submitted that Rivette does not teach, suggest or fairly disclose a user interface method of the type described above wherein the updating, based upon the received user input, at least one of a current object identity, a preview object identity, and a K-map parameter includes updating the K-map view selector based upon the received user input to correspond to a node view; and the displaying in a map pane the K-map includes displaying a non-hierarchical node view of the K-map.

2.   Claim 3 is Not Anticipated by Rivette

Claim 3 recites a user interface method according to claim 1, wherein the updating, based upon the received user input, at least one of a current object identity, a

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preview object identity, and a K-map parameter includes updating the K-map class selector value based upon the received user input; and the updating a K-map conditional upon updating a K-map parameter includes updating the K-map to include objects corresponding to the K-map class selector value.

In the rejection of claim 3, the Examiner took the position that Rivette teaches at col. 127, l. 6-35 updating a K-map conditional upon updating a K-map parameter including updating the K-map to include objects corresponding to the K-map class selector value.

Applicants respectfully disagree. As described in this section, child nodes are brought into focus by clicking on their particular parent nodes, not by selecting a parameter as the Examiner asserts. For instance, as shown in Figures 178 and 179, the child nodes of node 7 (e.g., nodes 13, 14, 15, 16, etc) are brought into focus by selecting node 7. There was no parameter updated to include nodes corresponding to a class selector value.

It is respectfully submitted that Rivette does not teach, suggest or fairly disclose a user interface method of the type described above wherein the updating, based upon the received user input, at least one of a current object identity, a preview object identity, and a K-map parameter includes updating the K-map class selector value based upon the received user input; and the updating a K-map conditional upon updating a K-map parameter includes updating the K-map to include objects corresponding to the K-map class selector value.

3.   Claim 4 is Not Anticipated by Rivette

Claim 4 recites a user interface method according to claim 3, wherein the updating a K-map class selector value includes updating the K-map selector value to correspond to one of a people class, a places class, and a things class based upon the received user input.

The Examiner took the position with regard to claim 4 that Rivette teaches at col. 117, l. 42 – col. 118, l. 30 and at Figure 163, item 16302 a step of updating a K-map

class selector value including updating the K-map selector value to correspond to one of a people class, a places class, and a things class based upon the perceived user input.

Appellants respectfully disagree and submit, however, that these portions of Rivette do not teach the limitations contained in claim 4. Figure 163 teaches a "Citation Analysis" dialog 16302 that does provide any class selection functionality, rather the dialog box 16302 merely allows the user to select which nodes to display by specifying the types of citations 16304 (forward or backward) and the levels of citation to be shown 16306.

Similarly, col. 117, l. 42 - col. 118, l. 30 does not teach class selection, rather, this section describes Figure 128, which illustrates a Report Generator screen 12802 that allows a user to select and/or configure reports to be run. For instance, button 12806 allows the user to select which report to run and the remaining fields allow the user to specify values filter the result set included in the report.

Therefore, col. 117, l. 42 – col. 118, l. 30 and Figure 163 of Rivette do not teach "updating a K-map class selector value including updating the K-map selector value to correspond to one of a people class, a places class, and a things class based upon the perceived user input" as recited in claim 4.

It is respectfully submitted that Rivette does not teach, suggest or fairly disclose a user interface method of the type described above wherein the updating a K-map class selector value includes updating the K-map selector value to correspond to one of a people class, a places class, and a things class based upon the received user input.

4.   Claim 5 is Not Anticipated by Rivette

Claim 5 recites a user interface method according to claim 1, wherein the updating, based upon the received user input, at least one of a current object identity, a preview object identity, and a K-map parameter includes updating the K-map scope based upon the received user input; and the updating a K-map conditional upon updating a K-map parameter includes updating the K-map to include objects which are cataloged in the knowledge portal as including fourth contents relating to the K-map

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object and having a strength of relationship respective to the K-map object within the updated K-map scope.

The Examiner has taken the position that col. 127, l. 6-35 of Rivette teaches that the number of links between one node to another is an indication of strength between one node to another.

Appellants respectfully disagree. The cited section of Rivette teaches the creation of hyperbolic trees with connections between nodes based merely on forward and backward citations. Accordingly, Rivette only considers whether a relationship exists, while the instant application considers the strength of relationships between objects. And, as stated with respect to claim 1, the only apparent strength of relationship mentioned in Rivette relates to the number of links between one note to another which is not a user-selectable measure of strength.

It is respectfully submitted that Rivette does not teach, suggest or fairly disclose a user interface method of the type described above wherein the updating, based upon the received user input, at least one of a current object identity, a preview object identity, and a K-map parameter includes updating the K-map scope based upon the received user input; and the updating a K-map conditional upon updating a K-map parameter includes updating the K-map to include objects which are cataloged in the knowledge portal as including fourth contents relating to the K-map object and having a strength of relationship respective to the K-map object within the updated K-map scope.

5.   Claim 6 is Not Anticipated by Rivette

Claim 6 recites a user interface method according to claim 1, wherein the receiving a user input includes receiving a selection of an updated current object identity from the user through the K-map pane, the updated current object identity being one of the objects indicated in the map pane; the updating, based on the received user input, at least one of the current object identity, the preview object identity, and a K-map parameter includes updating the K-map object to correspond with the updated current object; and the updating a K-map conditional upon updating a K-map parameter

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includes updating the K-map to include objects which are cataloged in the knowledge portal as including fourth contents related to the updated current object.

The Examiner cites col. 127, l. 6-35 of Rivette for a teaching of receiving a selection of an updated current object identity from the user through the K-map pane, the updated current object identity being one of the objects indicated in the map pane. The same portion of Rivette is cited for updating the K-map to include objects which are cataloged in the knowledge portal as including content related to the updated current object.

Appellants respectfully disagree and submit that this portion of Rivette does not teach the limitations contained in dependent claim 6. As an example, the Examiner has not provided a citation to Rivette which teaches "updating the K-map object to correspond with the update current object" such as is recited in the second element of claim 6. In addition, the portions of Rivette cited by the Examiner do not teach the other limitations recited in dependent claim 6 because, as stated earlier, the connections between the nodes of Rivette are based merely on forward and backward citations of patents. And, aside from the citation-based linkage between nodes, Rivette does not teach that updating is performed based on objects that are "cataloged in the knowledge portal."

It is respectfully submitted that Rivette does not teach, suggest or fairly disclose a user interface method of the type described above wherein the receiving a user input includes receiving a selection of an updated current object identity from the user through the K-map pane, the updated current object identity being one of the objects indicated in the map pane; the updating, based on the received user input, at least one of the current object identity, the preview object identity, and a K-map parameter includes updating the K-map object to correspond with the updated current object; and the updating a K-map conditional upon updating a K-map parameter includes updating the K-map to include objects which are cataloged in the knowledge portal as including fourth contents related to the updated current object.

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6.   Claim 7 is Not Anticipated by Rivette

Claim 7 recites a user interface method according to claim 1, wherein the receiving a user input includes receiving a selection of an updated preview object identity from the user through the K-map pane, the selected object identity being one of the objects indicated in the map pane, the method further comprising: displaying in the preview pane third contents associated with the updated preview object without changing the displaying in the document panel.

The Examiner cites Rivette at col. 125, l. 40 – col. 126, l. 8 for a teaching of displaying in a preview pane third contents associated with the updated preview object without changing the display in the document panel.

However, it is respectfully submitted that this portion of Rivette does not teach this element of dependent claim 7 because the cited section relates to a "Skim Images" display screen 14802 that essentially is a document panel configured to only show the first page of a selected patent. There is no associated preview panel that is separate from a document panel. Therefore, this section of Rivette does not teach "displaying in a preview pane third contents associated with the updated preview object without changing the display in the document panel" because there is only one panel--as shown in Figure 143, only one panel is provided to present document contents.

It is respectfully submitted that Rivette does not teach, suggest or fairly disclose a user interface method of the type described above wherein the receiving a user input includes receiving a selection of an updated preview object identity from the user through the K-map pane, the selected object identity being one of the objects indicated in the map pane, the method further comprising: displaying in the preview pane third contents associated with the updated preview object without changing the displaying in the document panel.

7.   Claim 8 is Not Anticipated by Rivette

Claim 8 recites a user interface method according to claim 1, wherein the receiving a user input includes receiving a text entry through user highlighting of text in

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the document display pane; the updating, based upon the received user input, at least one of a current object identity, a preview object identity, and a K-map parameter includes updating the K-map object to correspond with the received text entry; and the updating a K-map conditional upon updating a K-map parameter includes updating the K-map to include objects which are cataloged in the knowledge portal as including fifth content related to the selected text.

The Examiner has taken the position in the Office Action that the limitations set out in claim 8 are taught in Rivette at col. 118, l. 48 – col. 119, l. 42.

Appellants respectfully disagree and submit that these limitations as set out in dependent claim 8 are not taught in Rivette because those portions of Rivette identified by the Examiner teach entering text via text fields in a dialog box (such as item 12802 in Figure 128) rather than "receiving a text entry through user highlighting of text in the document display pane" as set out in claim 8.

It is respectfully submitted that Rivette does not teach, suggest or fairly disclose a user interface method of the type described above wherein the receiving a user input includes receiving a text entry through user highlighting of text in the document display pane; the updating, based upon the received user input, at least one of a current object identity, a preview object identity, and a K-map parameter includes updating the K-map object to correspond with the received text entry; and the updating a K-map conditional upon updating a K-map parameter includes updating the K-map to include objects which are cataloged in the knowledge portal as including fifth content related to the selected text.

8.   Claim 40 Is Not Anticipated by Rivette

Claim 40 recites a user interface method according to claim 7, wherein the preview pane third contents associated with the updated preview object and displayed in the preview pane are metadata stored in the knowledge portal rather than in the preview object itself.

The Examiner cites col. 115, l. 28 - col. 116, l. 42 of Rivette for a teaching of the preview pane third contents associated with the updated preview object and displayed

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in the preview pane are metadata stored in the knowledge portal rather than in the preview object itself.

Appellants respectfully disagree. This portion of Rivette does not teach the limitations contained in claim 40 because this section in Rivette is directed to "Console Tool Bars" and does not teach a preview pane. While this section describes the use of a "Notes Pane" (item 11708 from Figure 117), Rivette does not teach that the Notes Pane presents "metadata stored in the knowledge portal rather than in the preview object itself."

It is respectfully submitted that Rivette does not teach, suggest or fairly disclose a user interface method of the type described above wherein the preview pane third contents associated with the updated preview object and displayed in the preview pane are metadata stored in the knowledge portal rather than in the preview object itself.

9.   Claim 42 is Not Anticipated by Rivette

Claim 42 recites a user interface method according to claim 1, wherein the K-map parameter includes at least one of a scope, a view selector, a class selector, and a K-map object parameter.

The Examiner cites col. 117, l. 42-col. 118, l. 30 of Rivette for a teaching of the K-map parameter including at least one of a scope, a view selector, a class selector, and a K-map object parameter.

Appellants respectfully disagree. This portion of Rivette does not teach the limitations contained in claim 42 because as stated with respect to claim 4, col. 117, l. 42 - col. 118, l. 30 does not teach class selection. Rather, this section describes Figure 128, which illustrates a Report Generator screen 12802 that merely allows a user to select and/or configure reports to be run. For instance, button 12806 allows the user to select which report to run and the remaining fields allow the user to specify values on which to filter the result set presented in the report.

It is respectfully submitted that Rivette does not teach, suggest or fairly disclose a user interface method of the type described above wherein the K-map parameter

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includes at least one of a scope, a view selector, a class selector, and a K-map object parameter.

E.   Claim 10 is Not Anticipated by Rivette

Independent claim 10 describes an apparatus comprising a computer having a data store coupled thereto and one or more computer programs. The claim additionally recites a limitation such that one of the computer programs is used for updating a K-map conditional upon updating a K-map parameter, the K-map parameter including at least one of a scope, a view selector, a class selector, and a K-map object parameter. The claim recites another limitation for displaying in a document pane at least a portion of contents of the current object.

The Office Action makes reference to col. 118, line 45 through col. 119, line 44 of Rivette as allegedly corresponding to the recited limitation of claim 10 for updating a K-map conditional upon updating a K-map parameter, and displaying in a document pane at least a portion of the current object. However, claim 10, as amended, recites the K-map parameter as including at least one of a scope, a view selector, a class selector, and a K-map object parameter. As described in the specification of the present application (page 14, lines 11-15, page 18, lines 3-14, and page 20, lines 4-10), the K-map parameters preferably determine the range of objects included in the K-map. However, the above-mentioned parameters recited in the subject claim determine the range of objects to be included in a manner neither taught nor suggested in Rivette. For example, the scope parameter restricts contents of the K-map based on a strength of relationship; the view selector preferably selects between a node view and a tree view; the class selector limits objects to a specific class, e.g. people, places or things; and the object parameter constructs the K-map according to, e.g. keywords.

Further, claim 10 recites a limitation with respect to the document pane for displaying in the document pane at least a portion of <u>contents</u> of the current object. However, the document pane of the present application, as described from page 15, line 21 through page 16, line 4, and as recited in the subject claim, as amended, is used for displaying <u>content</u> of the current object. For example, in the case of text objects, the actual text is displayed. For non-text objects, the content is preferably displayed in a

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suitable format for the object. As a visual example, Figure 2 shows actual text from an exemplary text document. Rivette, on the other hand, teaches utilizing the document window (item 11706) for displaying a list of patents and other documents as described in col. 114, lines 22-40 and lines 58-67. In particular, Rivette describes the patents and other documents as being listed in a tabular or "spreadsheet" format (lines 25-26). As an example, Rivette shows an exemplary listing of a single patent (U.S. Patent No. 5,029,013) in the document window displayed in Figure 133. Note that no content of the exemplary patent is shown in the document window, or elsewhere in the figure. Nor does Rivette teach or fairly suggest displaying patent or other document content in the document window. In fact, as previously described, Rivette teaches displaying the patent or document content in another separate window as described in col. 115, lines 8-15, and shown in Figures 123-124.

It is respectfully submitted, therefore, that the Rivette patent does not teach each and every element of claim 10. For at least the above-stated reasons, it is respectfully submitted that independent claim 10 is patentably distinct and unobvious over the art of record.

Claims 11-12 and 14-18 and 43 depend from claim 10.

1.   Claim 11 is Not Anticipated by Rivette

Claim 11 recites an apparatus according to claim 10, wherein the updating, based upon the received user input, at least one of a current object identity, a preview object identity, and a K-map parameter includes updating the K-map view selector based upon the received user input, the K-map view selector having at least a node view selection option and a tree view selection option; and the displaying in a map pane the K-map includes selectively displaying one of a tree view and a node view of the K-map based upon the setting of the K-map view selector.

The Examiner cites col. 127, l. 6-35 of Rivette for a teaching of updating, based upon the received user input, at least one of a current object identity and a preview object identity. Figure 117, item 11710 "Group Window" and col. 114, l. 40-46 of Rivette is cited for a teaching of a tree view selection option.

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The Examiner further cites Figure 164, item 16412 and col. 129, l. 64 - c. 130 - l. 30 for a teaching of a K-map parameter including updating the K-map view selector based upon the received user input, the K-map view selector having at least a node view selection option. Appellants respectfully disagree. This section teaches a "patent citation tree function," which appears to be related to the rendering of a hierarchical structure comprising the forward and backward patent citations, and the specific rendering of particular nodes within the structure. This section DOES NOT describe K-map view selector functionality.

The Examiner still further cites col. 125, l. 40 - col. 126, l. 8 of Rivette for a teaching of the displaying in a map pane the K-map includes selectively displaying one of a tree view and a node view of the K-map based upon the setting of the K-map view selector. Appellants respectfully disagree. This section of Rivette is directed to allowing users to "view the first image page" of patents, as opposed to viewing the entire document. The view selection in this context relates to the manner of viewing a particular node (e.g., the first page of a single patent document rather than the entire patent)--there is no reference to "selectively displaying one of a tree view and a node view of the K-map" as recited in claim 11.

It is respectfully submitted that Rivette does not teach, suggest or fairly disclose an apparatus of the type described above wherein the updating, based upon the received user input, at least one of a current object identity, a preview object identity, and a K-map parameter includes updating the K-map view selector based upon the received user input, the K-map view selector having at least a node view selection option and a tree view selection option; and the displaying in a map pane the K-map includes selectively displaying one of a tree view and a node view of the K-map based upon the setting of the K-map view selector.

2.   Claim 12 is Not Anticipated by Rivette

Claim 12 recites an apparatus according to claim 10, wherein the updating, based upon the received user input, at least one of a current object identity, a preview object identity, and a K-map parameter includes updating the K-map class selector

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value based upon the received user input, the class selector including at least a people class selection option, a places class selection option, and a things class selection option; and the updating a K-map conditional upon updating a K-map parameter includes updating the K-map to include objects corresponding to the K-map class selector value.

The Examiner has taken the position in the Office Action that the limitations set out in claim 12 are taught in Rivette at col. 120, l. 8-62 and Figure 121, items "Inventor," "assignees" and "Patent #."

Applicants respectfully disagree. As described in this section, and as shown in Figures 121 and 122, the selection of items (e.g., "Inventor", "assignees" and "Patent#") depicted in Figure 121 is used to form a query, the results of which are shown in Figure 122. The result set in Figure 2 is tabular, it is not a K-map. This section does not describe "updating a K-map conditional upon updating a K-map parameter includes updating the K-map to include objects corresponding to the K-map class selector value" as recited in claim 12.

It is respectfully submitted that Rivette does not teach, suggest or fairly disclose an apparatus of the type described above wherein the updating, based upon the received user input, at least one of a current object identity, a preview object identity, and a K-map parameter includes updating the K-map class selector value based upon the received user input, the class selector including at least a people class selection option, a places class selection option, and a things class selection option; and the updating a K-map conditional upon updating a K-map parameter includes updating the K-map to include objects corresponding to the K-map class selector value.

3. Claim 14 is Not Anticipated by Rivette

Claim 14 recites an apparatus according to claim 10, wherein the updating, based upon the received user input, at least one of a current object identity, a preview object identity, and a K-map parameter includes updating the K-map scope based upon the received user input; and the updating a K-map conditional upon updating a K-map parameter includes updating the K-map to include objects within the K-map scope.

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The Examiner cites col. 120, l. 8-62 of Rivette for a teaching of the updating, based upon the received user input, at least one of a current object identity, a preview object identity, and a K-map parameter including updating the K-map scope based upon the received user input. The Examiner further cites col. 127, l. 6-35 of Rivette for a teaching of updating a K-map conditional upon updating a K-map parameter includes updating the K-map to include objects within the K-map scope.

Applicants respectfully disagree. As described in this section, child nodes are brought into focus by clicking on their particular parent nodes, not by selecting a parameter as the Examiner asserts. For instance, as shown in Figures 178 and 179, the child nodes of node 7 (e.g., nodes 13, 14, 15, 16, etc) are brought into focus by selecting node 7. There was no parameter selected to bring nodes 13-16 into focus. Therefore Rivette does not teach "updating a K-map conditional upon updating a K-map parameter includes updating the K-map to include objects within the K-map scope" as recited in claim 14.

It is respectfully submitted that Rivette does not teach, suggest or fairly disclose an apparatus of the type described above wherein the updating, based upon the received user input, at least one of a current object identity, a preview object identity, and a K-map parameter includes updating the K-map scope based upon the received user input; and the updating a K-map conditional upon updating a K-map parameter includes updating the K-map to include objects within the K-map scope.

4.   Claim 15 is Not Anticipated by Rivette

Claim 15 recites an apparatus according to claim 10, wherein the receiving a user input includes receiving a selection of the current object identity from the user through the K-map pane; and the updating a K-map conditional upon updating a K-map parameter includes updating the K-map to include objects related to the current object.

The Examiner cites col. 127, l. 6-35 of Rivette for a teaching of receiving a user input including receiving a selection of the current object identity from the user through the K-map pane. The Examiner further cites col. 127, l. 6-35 of Rivette for a teaching of

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updating a K-map conditional upon updating a K-map parameter includes updating the K-map to include objects related to the current object.

Appellants respectfully disagree. As described above with respect to claim 14, this col. 127, l. 6-35 and Figures 178 and 179 show that Rivette does not teach "the updating of a K-map parameter," rather Rivette teaches bringing child nodes into focus by selecting their corresponding parent node.

It is respectfully submitted that Rivette does not teach, suggest or fairly disclose an apparatus of the type described above wherein the receiving a user input includes receiving a selection of the current object identity from the user through the K-map pane; and the updating a K-map conditional upon updating a K-map parameter includes updating the K-map to include objects related to the current object.

5.   Claim 16 is Not Anticipated by Rivette

Claim 16 recites an apparatus according to claim 10, wherein the receiving a user input includes receiving a selection of the preview object identity from the user through the K-map pane.

The Examiner cites col. 138, l. 52 - col. 139, l. 42 of Rivette for a teaching of receiving a user input including receiving a selection of the preview object identity from the user through the K-map pane.

Appellants respectfully disagree. This section is directed to viewing a patent based on selecting a node from a hyperbolic tree. There is no reference to the rendering of a preview of the selected node. Therefore, this section of Rivette does not teach "receiving a selection of the preview object identity from the user through the K-map pane" as recited in claim 16.

It is respectfully submitted that Rivette does not teach, suggest or fairly disclose an apparatus of the type described above wherein the receiving a user input includes receiving a selection of the preview object identity from the user through the K-map pane.

6.   Claim 17 is Not Anticipated by Rivette

Claim 17 recites an apparatus according to claim 10, wherein the receiving a user input includes receiving a text entry supplied through user highlighting of text in the document display pane; the updating, based upon the received user input, at least one of a current object identity, a preview object identity, and a K-map parameter includes updating an object K-map parameter to correspond with the received text entry; and the updating a K-map conditional upon updating a K-map parameter includes updating the K-map to include objects related to the selected text.

The Examiner cites col. 111, l. 44 - col. 112, l. 52 of Rivette for a teaching of receiving a user input including receiving a text entry supplied through user highlighting of text in the document display pane. The Examiner further cites col. 127, l. 6 - 35 of Rivette for a teaching of updating, based upon the received user input, at least one of a current object identity, a preview object identity, and a K-map parameter includes updating an object K-map parameter to correspond with the received text entry. The Examiner still further cites col. 127, l. 6 - 35 of Rivette for a teaching of updating a K-map conditional upon updating a K-map parameter includes updating the K-map to include objects related to the selected text.

Applicants respectfully disagree. As described above with respect to claim 14, this col. 127, l. 6-35 and Figures 178 and 179 show that Rivette does not teach "the updating of a K-map parameter," rather Rivette teaches bringing child nodes into focus by selecting their corresponding parent node.

It is respectfully submitted that Rivette does not teach, suggest or fairly disclose an apparatus of the type described above wherein the receiving a user input includes receiving a text entry supplied through user highlighting of text in the document display pane; the updating, based upon the received user input, at least one of a current object identity, a preview object identity, and a K-map parameter includes updating an object K-map parameter to correspond with the received text entry; and the updating a K-map conditional upon updating a K-map parameter includes updating the K-map to include objects related to the selected text.

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7.   Claim 18 is Not Anticipated by Rivette

Claim 18 recites an apparatus according to claim 10, further including simultaneously displaying the document pane, the map pane, and the preview pane on a single display device.

The Examiner cites Figure 117, item 11706 "document window" and col. 113, l. 65 - col. 115, l. 27: section "console" of Rivette for a teaching of simultaneously displaying the document pane, the map pane, and the preview pane on a single display device.

Appellants respectfully disagree and submit that cited section of Rivette does not describe, among other filings, an associated preview pane. As described, the Notes Window 11708 is not a Preview Pane. Therefore, this section of Rivette does not teach updating of the preview object without affecting the current display pane.

It is respectfully submitted that Rivette does not teach, suggest or fairly disclose an apparatus of the type described above which includes simultaneously displaying the document pane, the map pane, and the preview pane on a single display device.

8.   Claim 43 is Not Anticipated by Rivette

Claim 43 recites an apparatus according to claim 10, wherein the K-map parameter includes at least one of a scope, a view selector, a class selector, and a K-map object parameter.

The Examiner states that claim 43 is of the same scope as claim 42. Accordingly, Appellants refer the Board to the discussion related to claim 42 above and incorporates those arguments herein.

It is respectfully submitted that Rivette does not teach, suggest or fairly disclose an apparatus of the type described above wherein the K-map parameter includes at least one of a scope, a view selector, a class selector, and a K-map object parameter.

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F.   Claim 19 is Not Anticipated by Rivette

Independent claim 19, recites a limitation for displaying in a document pane at least a portion of contents of a current object.

As with claim 1, the Office Action rejects claim 19 based partially on Figure 117, item 11706, and col. 113, line 65 through col. 115, line 27 of Rivette. The Office Action interprets the "document window" of Rivette (item 11706) as allegedly corresponding to the document pane of the present application. It should first be pointed out that the document pane of the present application, as described from page 15, line 21 through page 16, line 4, and as recited in the subject claim, as amended, is used for displaying content of the current object. For example, in the case of text objects, the actual text is displayed. For non-text objects, the content is preferably displayed in a suitable format for the object. As a visual example, Figure 2 shows actual text from an exemplary text document. Rivette, on the other hand, teaches utilizing the document window (item 11706) for displaying a list of patents and other documents as described in col. 114, lines 22-40 and lines 58-67. In particular, Rivette describes the patents and other documents as being listed in a tabular or "spreadsheet" format (lines 25-26).

As an example, Rivette shows an exemplary listing of a single patent (U.S. Patent No. 5,029,013) in the document window displayed in Figure 133. Note that no content of the exemplary patent is shown in the document window, or elsewhere in the figure. Nor does Rivette teach or fairly suggest displaying patent or other document content in the document window. In fact, to the contrary, Rivette teaches displaying the patent or document content in another separate window as described in col. 115, lines 8-15, and shown in Figures 123-124. Rivette describes showing text of a selected patent in a text window, and an image of the selected patent in an image window, where the operator may view the text and image windows either separately, or simultaneously. However, Rivette apparently does not teach displaying either the text window or the image window simultaneously with, or included within, the document window. On the other hand, as described above, Claim 19 of the present application recites a limitation wherein the document pane (which displays content of the object), map pane, and preview pane are displayed simultaneously on a single display device. Although the Office Action, on page 3, makes reference to Figure 117 of Rivette as an example of the

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document pane, map pane, and preview pane being displayed simultaneously, as described above with reference to similar Figure 133, the document window of Rivette does not display content of patents or other documents.

It is respectfully submitted, therefore, that the Rivette patent does not teach each and every element of claim 19. For at least the above-stated reasons, it is respectfully submitted that Independent claim 19 is patentably distinct over Rivette.

Claims 20-22, 24-26, and 41 depend from claim 19.

1.   Claim 20 is Not Anticipated by Rivette

Claim 20 recites an article of manufacture according to claim 19, wherein the displaying in a map pane the K-map includes displaying a node view of the K-map limited to related objects having a strength of relationship respective to the K-map object greater than a specified value.

The Examiner has taken the position in the Office Action that the limitations set out in claim 20 are taught in Rivette at col. 127, l. 6 - 35. The Examiner states that "[b]y limiting the displaying to a specific number of degrees, the K-map is limiting the displayed objects based on degree of relevance."

Appellants respectfully disagree. As described earlier with respect to claim 1 and claim 5, Rivette merely describes showing nodes based on levels of citation, not "a strength of relationship respective to the K-map object greater than a specified value" as recited in claim 20. Accordingly, Rivette only considers whether a relationship exists, while the instant application considers the strength of relationships between objects. And, as stated with respect to claim 1, the only apparent strength of relationship mentioned in Rivette relates to the number of links between one note to another which is not a user-selectable measure of strength.

It is respectfully submitted that Rivette does not teach, suggest or fairly disclose an article of manufacture of the type described above wherein the displaying in a map pane the K-map includes displaying a node view of the K-map limited to related objects having a strength of relationship respective to the K-map object greater than a specified value.

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2.   Claim 21 is Not Anticipated by Rivette

Claim 21 recites an article of manufacture according to claim 19, wherein the displayed K-map includes objects corresponding to a user-selectable K-map class selector value.

The Examiner states that claims 21 and 22 are of the same scope as claims 3 and 4. Accordingly, Appellants refer the Board to the discussion related to claims 3 and 4 above and incorporate those arguments by reference herein.

It is respectfully submitted that Rivette does not teach, suggest or fairly disclose an article of manufacture of the type described above wherein the displayed K-map includes objects corresponding to a user-selectable K-map class selector value.

3.   Claim 22 is Not Anticipated by Rivette

Claim 22 recites an article of manufacture according to claim 21, wherein the K-map selector value corresponds to one of a people class, a places class, and a things class.

The Examiner states that claims 21 and 22 are of the same scope as claims 3 and 4. Accordingly, Appellants refer the Board to the discussion related to claims 3 and 4 above and incorporate those arguments by reference herein.

It is respectfully submitted that Rivette does not teach, suggest or fairly disclose an article of manufacture of the type described above wherein the K-map selector value corresponds to one of a people class, a places class, and a things class.

4.   Claim 24 is Not Anticipated by Rivette

Claim 24 recites an article of manufacture according to claim 19, wherein the method further includes: receiving a selection of an updated current object identity from the user through the K-map pane; constructing an updated K-map that includes objects related to the updated current object; displaying at least a portion of fourth contents of

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the updated current object in the document pane; and displaying the updated K-map in the map pane.

The Examiner cites col. 127, l. 6 - 35 of Rivette for a teaching of receiving a selection of an updated current object identity from the user through the K-map pane. The Examiner further cites col. 127, l. 6 - 35 of Rivette for a teaching of constructing an updated K-map that includes objects related to the updated current object. The Examiner still further cites col. 127, l. 6 - 35 of Rivette for a teaching of displaying at least a portion of fourth contents of the updated current object in the document pane; and displaying the updated K-map in the map pane.

Appellants respectfully disagree. The cited portions of Rivette and corresponding Figure 177, do not teach, show or suggest displaying a document pane and an updated K-map in the map pane -- rather, only a hyperbolic tree showing relationship between nodes is shown in Figure 177 and discussed in col. 127, l. 6 - 35.

It is respectfully submitted that Rivette does not teach, suggest or fairly disclose an article of manufacture of the type described above wherein the method further includes: receiving a selection of an updated current object identity from the user through the K-map pane; constructing an updated K-map that includes objects related to the updated current object; displaying at least a portion of fourth contents of the updated current object in the document pane; and displaying the updated K-map in the map pane.

5.   Claim 25 is Not Anticipated by Rivette

Claim 25 recites an article of manufacture according to claim 19, wherein the method further includes: receiving a selection of the preview object identity from the user through the K-map pane.

The Examiner has taken the position in the Office Action that the limitations set out in claim 25 are taught in Rivette at col. 118, l. 45 - col. 119, l. 45.

Appellants respectfully disagree.   The cited section relates to "Adding a Document Note" via a Text window 12506.   This section discusses a Note Window

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12514 for accepting user notes corresponding to a patent, but there are no preview objects or an associated preview panel.

It is respectfully submitted that Rivette does not teach, suggest or fairly disclose an article of manufacture of the type described above wherein the method further includes: receiving a selection of the preview object identity from the user through the K-map pane.

6.   Claim 26 is Not Anticipated by Rivette

Claim 26 recites an article of manufacture according to claim 19, wherein the method further includes: receiving a text entry supplied through user highlighting of text in the document display pane; and updating the K-map to include objects related to the selected text.

The Examiner cites col. 127, I. 6 - 35 of Rivette for a teaching of receiving a text entry supplied through user highlighting of text in the document display pane. The Examiner further cites col. 127, I. 6 - 35 of Rivette for a teaching of updating the K-map to include objects related to the selected text.

Appellants respectfully disagree. This section of Rivette describes the focusing of the hyperbolic tree based on selecting a particular node within the tree. There is no reference to "receiving a text entry supplied through user highlighting of text in the document display pane."

It is respectfully submitted that Rivette does not teach, suggest or fairly disclose an article of manufacture of the type described above wherein the method further includes: receiving a text entry supplied through user highlighting of text in the document display pane; and updating the K-map to include objects related to the selected text.

7.   Claim 41 is Not Anticipated by Rivette

Claim 41 recites an article of manufacture according to claim 19, wherein the method further includes: updating the K-map object to correspond to one of a group

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consisting of: (i) a double-clicked K-map entry, (ii) text in the document pane that is highlighted by a user, and (iii) one or more search terms entered by a user; and updating the displayed K-map to identify at least (i) related objects having fourth contents related to the updated K-map object, and (ii) a measure of a strength of relationship between each related object and the updated K-map object.

The Examiner states that Rivette teaches updating the K-map object to correspond to one of a group consisting of: (i) a double-clicked K-map entry (col. 127, l. 6 - 35), (ii) text in the document pane that is highlighted by a user (Figure 117, item 11706 "document window" and col. 113, l. 65 - col. 115, l. 27: section "console"), and (iii) one or more search terms entered by a user (col. 120, l. 28-62). The Examiner further cites col. 127, l. 6 - 35 of Rivette for a teaching of updating the displayed K-map to identify at least (i) related objects having fourth contents related to the updated K-map object, and (ii) a measure of a strength of relationship between each related object and the updated K-map object.

Appellants respectfully disagree. This section of Rivette is merely describing the presentation of nodes based on levels of citation, not "a strength of relationship respective to the K-map object greater than a specified value" as recited in claim 41.. And, as stated with respect to claim 1, the only apparent strength of relationship mentioned in Rivette relates to the existence of links between nodes.

It is respectfully submitted that Rivette does not teach, suggest or fairly disclose an article of manufacture of the type described above wherein the method further includes: updating the K-map object to correspond to one of a group consisting of: (i) a double-clicked K-map entry, (ii) text in the document pane that is highlighted by a user, and (iii) one or more search terms entered by a user; and updating the displayed K-map to identify at least (i) related objects having fourth contents related to the updated K-map object, and (ii) a measure of a strength of relationship between each related object and the updated K-map object.

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E.   Claim 28 is Not Anticipated by Rivette

Independent claim 28, recites a limitation for a K-map processor for calculating a K-map corresponding to a current object and a set of K-map parameters, the K-map identifying objects indicated by a catalog of the knowledge portal as having content related to the current object, and the set of K-map parameters including at least one of a scope, a view selector, a class selector, and a K-map object parameter, and a limitation for a current object display pane for displaying at least a portion of contents of the current object.

The Office Action rejects claim 28 based on Figure 117, item 11706, and col. 113, line 65 through col. 115, line 27 of Rivette, and also based on col. 118, line 45 through col. 119, line 44. The Office Action interprets the "document window" of Rivette (item 11706) as allegedly corresponding to the document pane of the present application. It should first be pointed out that the document pane of the present application, as described from page 15, line 21 through page 16, line 4, and as recited in the subject claim, as amended, is used for displaying content of the current object. For example, in the case of text objects, the actual text is displayed. For non-text objects, the content is preferably displayed in a suitable format for the object. As a visual example, Figure 2 shows actual text from an exemplary text document. Rivette, on the other hand, teaches utilizing the document window (item 11706) for displaying a list of patents and other documents as described in col. 114, lines 22-40 and lines 58-67. In particular, Rivette describes the patents and other documents as being listed in a tabular or "spreadsheet" format (lines 25-26).

As an example, Rivette shows an exemplary listing of a single patent (U.S. Patent No. 5,029,013) in the document window displayed in Figure 133. Note that no content of the exemplary patent is shown in the document window, or elsewhere in the figure. Nor does Rivette teach or fairly suggest displaying patent or other document content in the document window. In fact, to the contrary, Rivette teaches displaying the patent or document content in another separate window as described in col. 115, lines 8-15, and shown in Figures 123-124. Rivette describes showing text of a selected

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patent in a text window, and an image of the selected patent in an image window, where the operator may view the text and image windows either separately, or simultaneously.

Further, new dependent claims 42-44 recite a set of K-map parameters, <u>the set of K-map parameters including at least one of a scope, a view selector, a class selector, and a K-map object parameter</u>. As described in the specification of the present application (page 14, lines 11-15, page 18, lines 3-14, and page 20, lines 4-10), the K-map parameters preferably determine the range of objects included in the K-map. However, the above-mentioned parameters recited in the subject claim determine the range of objects to be included in a manner neither taught nor suggested in Rivette. For example, the scope parameter restricts contents of the K-map based on a strength of relationship; the view selector preferably selects between a node view and a tree view; the class selector limits objects to a specific class, e.g. people, places or things; and the object parameter constructs the K-map according to, e.g. keywords. It should be noted that the scope parameter is user adjustable as described on page 18, lines 2-4, preferably by means of a "Scope" slider bar. The only apparent strength of relationship mentioned in Rivette relates to the number of links between one note to another which is not a user-selectable measure of strength.

It is respectfully submitted, therefore, that the Rivette patent does not teach each and every element of claim 28. For at least the above-stated reasons, it is respectfully submitted that independent claim 28 is patentably distinct over Rivette.

Claims 29-39 and 44 depend from claim 28.

1.   Claim 29 is Not Anticipated by Rivette

Claim 29 recites a user interface according to claim 28, wherein the K-map display pane displays the K-map in a non-hierarchical node view.

The Examiner states that claim 29 is of the same scope as claim 2. Accordingly, Appellants refer the Board to Appellants arguments with respect to claim 2 and incorporate these arguments by reference herein.

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It is respectfully submitted that Rivette does not teach, suggest or fairly disclose a user interface of the type described above wherein the K-map display pane displays the K-map in a non-hierarchical node view.

    2.   <u>Claim 30 is Not Anticipated by Rivette</u>

Claim 30 recites a user interface according to claim 28, wherein the K-map processor calculates a K-map containing objects limited to objects corresponding to the K-map class parameter.

The Examiner cites col. 117, l. 42 - col. 118, l. 30 of Rivette for a teaching of the K-map processor calculating a K-map containing objects limited to objects corresponding to the K-map class parameter.

Appellants respectfully disagree. The cited section of Rivette does not teach calculating a K-map per objects corresponding to the K-map class parameter. Rather, this section describes Figure 128, which illustrates a Report Generator screen 12802 that allows a user to select and/or configure reports to be run. For instance, button 12806 allows the user to select which report to run and the remaining fields allow the user to specify values filter the result set included in the report.

It is respectfully submitted that Rivette does not teach, suggest or fairly disclose a user interface of the type described above wherein the K-map processor calculates a K-map containing objects limited to objects corresponding to the K-map class parameter.

    3.   <u>Claim 31 is Not Anticipated by Rivette</u>

Claim 31 recites a user interface according to claim 30, wherein the means for receiving a user input include a pointing device selection means operative at least within the K-map display pane; and the class parameter is selectively updateable by the user via the pointing device selection means operating on a graphical class input dialog.

The Examiner cites col. 127, l. 6 - 35 of Rivette for a teaching of the means for receiving a user input include a pointing device selection means operative at least within

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the K-map display pane. The Examiner further cites col. 117, l. 42 - col. 118, l. 30 of Rivette for a teaching of the class parameter is selectively updateable by the user via the pointing device selection means operating on a graphical class input dialog.

Appellants respectfully disagree. In Rivette, col. 117, l. 42 - col. 118, l. 30 does not teach that a class parameter is selectively updatable, rather, this section describes Figure 128, which illustrates a Report Generator screen 12802 that allows a user to select and/or configure reports to be run. For instance, button 12806 allows the user to select which report to run and the remaining fields allow the user to specify values filter the result set included in the report.

It is respectfully submitted that Rivette does not teach, suggest or fairly disclose a user interface of the type described above wherein the means for receiving a user input include a pointing device selection means operative at least within the K-map display pane; and the class parameter is selectively updateable by the user via the pointing device selection means operating on a graphical class input dialog.

4.   Claim 32 is Not Anticipated by Rivette

Claim 32 recites a user interface according to claim 30, wherein the class parameter selectively takes values including a people class value, a places class value, and a things class value.

The Examiner states that claim 32 is of the same scope as claim 4. Accordingly, Appellants refer the Board to the discussion related to claim 4 above and incorporate these arguments by reference herein.

It is respectfully submitted that Rivette does not teach, suggest or fairly disclose a user interface of the type described above wherein the class parameter selectively takes values including a people class value, a places class value, and a things class value.

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5.   Claim 33 is Not Anticipated by Rivette

Claim 33 recites a user interface according to claim 28, wherein the K-map processor calculates a K-map containing objects limited to objects whose relationship to the current object falls within the K-map scope parameter value.

The Examiner has taken the position in the Office Action that the limitations set out in claim 33 are taught in Rivette at col. 117, l. 42 - col. 118, l. 30.

Appellants respectfully disagree. This section of Rivette, col. 117, l. 42 - col. 118, l. 30, does not teach the K-map processor calculating a K-map containing objects. Rather, this section describes Figure 128, which illustrates a Report Generator screen 12802 that allows a user to select and/or configure reports to be run. Further, instead of a K-map calculation being performed, the user simply specifies via text box 12810 how many levels of citation are to be displayed.

It is respectfully submitted that Rivette does not teach, suggest or fairly disclose a user interface of the type described above wherein the K-map processor calculates a K-map containing objects limited to objects whose relationship to the current object falls within the K-map scope parameter value.

6.   Claim 34 is Not Anticipated by Rivette

Claim 34 recites a user interface according to claim 33, wherein the means for receiving a user input include a pointing device selection means operative at least within the K-map display pane; and the scope parameter is selectively updateable by the user via the pointing device selection means operating on a graphical scope input dialog.

The Examiner cites col. 127, l. 6 - 35 of Rivette for a teaching of the means for receiving a user input include a pointing device selection means operative at least within the K-map display pane. The Examiner further cites col. 127, l. 6 - 35 of Rivette for a teaching of the scope parameter being selectively updateable by the user via the pointing device selection means operating on a graphical scope input dialog.

Appellants respectfully disagree. As described in this section, child nodes are brought into focus by clicking on their particular parent nodes, not by a selectively

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updatable parameter as the Examiner asserts. For instance, as shown in Figures 178 and 179, the child nodes of node 7 (e.g., nodes 13, 14, 15, 16, etc) are brought into focus by selecting node 7. There was no parameter selected to bring nodes 13-16 into focus. Therefore Rivette does not teach "updating a K-map conditional upon updating a . K-map parameter includes updating the K-map to include objects within the K-map scope" as recited in 34.

It is respectfully submitted that Rivette does not teach, suggest or fairly disclose a user interface of the type described above wherein the means for receiving a user input include a pointing device selection means operative at least within the K-map display pane; and the scope parameter is selectively updateable by the user via the pointing device selection means operating on a graphical scope input dialog.

7.   Claim 35 is Not Anticipated by Rivette

Claim 35 recites a user interface according to claim 34, wherein the graphical scope input dialog is a slider bar.

The Examiner cites col. 115, l. 28 - col. 116, l. 42, section "console tool bar" of Rivette for a teaching of the graphical scope input dialog is a slider bar. Appellants respectfully disagree. The cited section of Rivette does not discuss, nor is there shown in the corresponding figures, a slider bar implemented to accept scope related user input.

It is respectfully submitted that Rivette does not teach, suggest or fairly disclose a user interface of the type described above wherein the graphical scope input dialog is a slider bar.

8.   Claim 36 is Not Anticipated by Rivette

Claim 36 recites a user interface according to claim 28, wherein the means for receiving a user input include a pointing device selection means operative at least within the K-map display pane; and the current object is selectively updateable by the user via the pointing device selection means operating within the K-map display pane.

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The Examiner cites col. 115, l. 28 - col. 116, l. 42, section "console tool bar" of Rivette for a teaching of the means for receiving a user input include a pointing device selection means operative at least within the K-map display pane. The Examiner further cites col. 115, l. 28 - col. 116, l. 42, section "console tool bar" of Rivette for a teaching of the current object being selectively updateable by the user via the pointing device selection means operating within the K-map display pane.

Appellants respectfully disagree. The cited section of Rivette and corresponding Figure 117 describes a Group Window 11704 configured to display a group hierarchy. However, as described and shown, the Group Window is not configured for objects within to be selectively updatable by the user via a pointing device.

It is respectfully submitted that Rivette does not teach, suggest or fairly disclose a user interface of the type described above wherein the means for receiving a user input include a pointing device selection means operative at least within the K-map display pane; and the current object is selectively updateable by the user via the pointing device selection means operating within the K-map display pane.

9.   Claim 37 is Not Anticipated by Rivette

Claim 37 recites a user interface according to claim 28, wherein the means for receiving a user input include a pointing device selection means operative at least within the K-map display pane; and the preview object is selectively updateable by the user via the pointing device selection means operating within the K-map display pane, the updating of the preview object not affecting the current display pane.

The Examiner cites col. 127, l. 6 - 35 of Rivette for a teaching of the means for receiving a user input include a pointing device selection means operative at least within the K-map display pane. The Examiner further cites col. 118, l. 45 - col. 119 l. 44 of Rivette for a teaching of the preview object being selectively updateable by the user via the pointing device selection means operating within the K-map display pane. The Examiner still further cites col. 115, l. 28 - col. 116, l. 42, section "console tool bar" of Rivette for a teaching of the updating of the preview object not affecting the current display pane.

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Appellants respectfully disagree and submit that col. 115, l. 28 - col. 116, l. 42 of Rivette does not describe an associated preview pane that is separate from a document panel--as described, the Notes Window 11708 is not a Preview Pane. Therefore, this section of Rivette does not teach updating of the preview object without affecting the current display pane.

It is respectfully submitted that Rivette does not teach, suggest or fairly disclose a user interface of the type described above wherein the means for receiving a user input include a pointing device selection means operative at least within the K-map display pane; and the preview object is selectively updateable by the user via the pointing device selection means operating within the K-map display pane, the updating of the preview object not affecting the current display pane.

10.   Claim 38 is Not Anticipated by Rivette

Claim 38 recites a user interface according to claim 28, wherein the set of K-map parameters includes an object parameter, said object parameter being selectively updateable by the user; and the K-map processor calculates a K-map containing objects related to the object corresponding to the object parameter.

The Examiner cites col. 115, l. 28 - col. 116, l. 42 of Rivette for a teaching of the set of K-map parameters includes an object parameter, said object parameter being selectively updateable by the user. The Examiner further cites col. 120, l. 8-62 of Rivette for a teaching of the K-map processor calculates a K-map containing objects related to the object corresponding to the object parameter.

Appellants respectfully disagree. The cited section of Rivette does not teach calculating a K-map per objects corresponding to the object parameter. Rather, this section describes Figure 122, which illustrates an example console 12202 comprising results from Search screen 12102. There is no discussion in this section of calculating K-maps based on object parameters.

It is respectfully submitted that Rivette does not teach, suggest or fairly disclose a user interface of the type described above wherein the set of K-map parameters includes an object parameter, said object parameter being selectively updateable by the

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user; and the K-map processor calculates a K-map containing objects related to the object corresponding to the object parameter.

11.   Claim 39 is Not Anticipated by Rivette

Claim 39 recites a user interface according to claim 38, wherein the means for receiving a user input include a pointing device selection means operative at least within the document display pane whereby the user selectively updates the object parameter by selecting text corresponding thereto from the second contents of the object display pane.

The Examiner cites col. 127, l. 6 - 35 of Rivette for a teaching of the means for receiving a user input include a pointing device selection means operative at least within the document display pane whereby the user selectively updates the object parameter by selecting text corresponding thereto from the second contents of the object display pane.

Appellants respectfully disagree. Rivette does not teach in the cited selection, or in corresponding Figure 177, the "selection of text." Rather, Rivette only discusses the selection of nodes within a hyperbolic tree.

It is respectfully submitted that Rivette does not teach, suggest or fairly disclose a user interface of the type described above wherein the means for receiving a user input include a pointing device selection means operative at least within the document display pane whereby the user selectively updates the object parameter by selecting text corresponding thereto from the second contents of the object display pane.

12.   Claim 44 is Not Anticipated by Rivette

Claim 44 recites a user interface according to claim 28, wherein the set of K-map parameters includes at least one of a scope, a view selector, a class selector, and a K-map object parameter.

The Examiner states that claim 44 is of the same scope as claim 42. Accordingly, please refer to the discussion related to claim 42 above.

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It is respectfully submitted that Rivette does not teach, suggest or fairly disclose a user interface of the type described above wherein the set of K-map parameters includes at least one of a scope, a view selector, a class selector, and a K-map object parameter.

In sum, regarding independent claims 1, 10, 19, and 28, and their respective dependent claims, Applicants respectfully submit that the Examiner has failed to establish a prima facie case of anticipation, which requires that each and every limitation of a claimed invention be in the disclosure of a single piece of prior art. Apple Computer, Inc. v. Articulate Sys., Inc., 234 F.3d 14, 20 (Fed. Cir. 2000), Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). Accordingly, claims 1-8, 10-12, 14-22, 24-26, and 28-44 should be allowed.
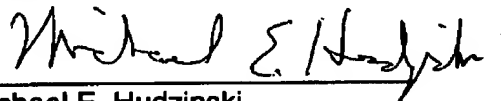
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VIII. CONCLUSION

For at least the above reasons, Appellants respectfully submit that all pending claims are patentably distinct and unobvious over the references of record.

Allowance of all claims and early notice to that effect is respectfully requested.

Respectfully submitted,

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APPENDICES

IX.   CLAIMS APPENDIX

Claims involved in the Appeal are as follows:

The status of the claims is as follows after the <u>Response</u> to the Final Office Action:

       1.   (Previously Presented)   A user interface method for executing one or more operations in a computer for interfacing an associated user with a knowledge portal that is operatively associated with a plurality of data objects, the user interface method comprising:

displaying in a document pane at least a portion of first contents of a current object;

displaying in a map pane a K-map indicating objects which are cataloged in the knowledge portal as including second contents related to a selected K-map object;

displaying in a preview pane third contents associated with a preview object selected from the K-map, wherein the document pane, map pane, and preview pane are displayed simultaneously on a single display device;

receiving a user input;

updating, based upon the received user input, at least one of a first identify of said current object, a second identity of said preview object, and a K-map parameter; and

updating the K-map conditional upon the updating of a K-map parameter.

       2.   (Previously Presented)   The user interface method as set forth in claim 1, wherein:

   the updating, based upon the received user input, at least one of a current object identity, a preview object identity, and a K-map parameter includes updating the K-map view selector based upon the received user input to correspond to a node view; and

the displaying in a map pane the K-map includes displaying a non-hierarchical node view of the K-map.

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3.   (Previously Presented)   The user interface method as set forth in claim 1, wherein:

the updating, based upon the received user input, at least one of a current object identity, a preview object identity, and a K-map parameter includes updating the K-map class selector value based upon the received user input; and

the updating a K-map conditional upon updating a K-map parameter includes updating the K-map to include objects corresponding to the K-map class selector value.

4.   (Previously Presented)   The user interface method as set forth in claim 3, wherein:

the updating a K-map class selector value includes updating the K-map selector value to correspond to one of a people class, a places class, and a things class based upon the received user input.

5.   (Previously Presented)   The user interface method as set forth in claim 1, wherein:

the updating, based upon the received user input, at least one of a current object identity, a preview object identity, and a K-map parameter includes updating the K-map scope based upon the received user input; and

the updating a K-map conditional upon updating a K-map parameter includes updating the K-map to include objects which are cataloged in the knowledge portal as including fourth contents relating to the K-map object and having a strength of relationship respective to the K-map object within the updated K-map scope.

6.   (Previously Presented)   The user interface method as set forth in claim 1, wherein:

the receiving a user input includes receiving a selection of an updated current object identity from the user through the K-map pane, the updated current object identity being one of the objects indicated in the map pane;

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the updating, based on the received user input, at least one of the current object identity, the preview object identity, and a K-map parameter includes updating the K-map object to correspond with the updated current object; and

the updating a K-map conditional upon updating a K-map parameter includes updating the K-map to include objects which are cataloged in the knowledge portal as including fourth contents related to the updated current object.

7.   (Previously Presented)   The user interface method as set forth in claim 1, wherein the receiving a user input includes receiving a selection of an updated preview object identity from the user through the K-map pane, the selected object identity being one of the objects indicated in the map pane, the method further comprising:

displaying in the preview pane third contents associated with the updated preview object without changing the displaying in the document panel.

8.   (Previously Presented)   The user interface method as set forth in claim 1, wherein:

the receiving a user input includes receiving a text entry through user highlighting of text in the document display pane;

the updating, based upon the received user input, at least one of a current object identity, a preview object identity, and a K-map parameter includes updating the K-map object to correspond with the received text entry; and

the updating a K-map conditional upon updating a K-map parameter includes updating the K-map to include objects which are cataloged in the knowledge portal as including fifth content related to the selected text.

9.   (Canceled)

10.   (Previously Presented)   An apparatus for executing one or more operations in a computer for interfacing an associated user with a knowledge portal operatively associated with a plurality of data objects, the apparatus comprising:

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a computer having a data store coupled thereto, wherein the data store stores the plurality of data objects; and

one or more computer programs, performed by the computer for:

receiving a user input,

updating, based upon the received user input, at least one of a current object identity, a preview object identity, and a K-map parameter,

updating a K-map conditional upon updating a K-map parameter,

displaying in a document pane at least a portion of first contents of the current object,

displaying in a map pane the K-map, and

displaying in a preview pane second contents associated with the preview object.

11.   (Previously Presented)   The apparatus as set forth in claim 10, wherein:

the updating, based upon the received user input, at least one of a current object identity, a preview object identity, and a K-map parameter includes updating the K-map view selector based upon the received user input, the K-map view selector having at least a node view selection option and a tree view selection option; and

the displaying in a map pane the K-map includes selectively displaying one of a tree view and a node view of the K-map based upon the setting of the K-map view selector.

12.   (Previously Presented)   The apparatus as set forth in claim 10, wherein:

the updating, based upon the received user input, at least one of a current object identity, a preview object identity, and a K-map parameter includes updating the K-map class selector value based upon the received user input, the class selector including at least a people class selection option, a places class selection option, and a things class selection option; and

the updating a K-map conditional upon updating a K-map parameter includes updating the K-map to include objects corresponding to the K-map class selector value.

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13.   (Canceled)

14.   (Previously Presented)   The apparatus as set forth in claim 10, wherein:

the updating, based upon the received user input, at least one of a current object identity, a preview object identity, and a K-map parameter includes updating the K-map scope based upon the received user input; and

the updating a K-map conditional upon updating a K-map parameter includes updating the K-map to include objects within the K-map scope.

15.   (Previously Presented)   The apparatus as set forth in claim 10, wherein:

the receiving a user input includes receiving a selection of the current object identity from the user through the K-map pane; and

the updating a K-map conditional upon updating a K-map parameter includes updating the K-map to include objects related to the current object.

16.   (Previously Presented)   The apparatus as set forth in claim 10, wherein:

the receiving a user input includes receiving a selection of the preview object identity from the user through the K-map pane.

17.   (Previously Presented)   The apparatus as set forth in claim 10, wherein:

the receiving a user input includes receiving a text entry supplied through user highlighting of text in the document display pane;

the updating, based upon the received user input, at least one of a current object identity, a preview object identity, and a K-map parameter includes updating an object K-map parameter to correspond with the received text entry; and

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the updating a K-map conditional upon updating a K-map parameter includes updating the K-map to include objects related to the selected text.

18.   (Original)   The apparatus as set forth in claim 10, further including:

simultaneously displaying the document pane, the map pane, and the preview pane on a single display device.

19.   (Previously Presented)   An article of manufacture comprising a program storage medium readable by a computer and embodying one or more instructions executable by the computer to perform a method for executing an operation to perform a user interface method for interfacing an associated user with a knowledge portal operatively associated with a plurality of data objects, the method comprising:

generating a knowledge portal catalog cataloging data objects based on content, the knowledge portal contextually linking the objects based on document content;

displaying in a document pane at least a portion of first contents of a current object;

constructing a K-map identifying related objects having second contents related to a K-map object as measured by a strength of relationship between the related object and the K-map object;

displaying in a map pane the K-map; and

displaying in a preview pane third contents associated with a preview object selected from the related objects, the preview pane being displayed simultaneously with the document pane and the map pane.

20.   (Previously Presented)   The article of manufacture as set forth in claim 19, wherein:

the displaying in a map pane the K-map includes displaying a node view of the K-map limited to related objects having a strength of relationship respective to the K-map object greater than a specified value.

21.   (Previously Presented)   The article of manufacture as set forth in claim 19, wherein:

the displayed K-map includes objects corresponding to a user-selectable K-map class selector value.

22.   (Previously Presented)   The article of manufacture as set forth in claim 21, wherein:

the K-map selector value corresponds to one of a people class, a places class, and a things class.

23.   (Canceled)

24.   (Previously Presented)   The article of manufacture as set forth in claim 19, wherein the method further includes:

receiving a selection of an updated current object identity from the user through the K-map pane;

constructing an updated K-map that includes objects related to the updated current object;

displaying at least a portion of fourth contents of the updated current object in the document pane; and

displaying the updated K-map in the map pane.

25.   (Previously Presented)   The article of manufacture as set forth in claim 19, wherein the method further includes:

receiving a selection of the preview object identity from the user through the K-map pane.

26.   (Previously Presented)   The article of manufacture as set forth in claim 19, wherein the method further includes:

receiving a text entry supplied through user highlighting of text in the document display pane; and

updating the K-map to include objects related to the selected text.

27.   (Canceled)

28.   (Previously Presented)   A user interface for interfacing an associated
user with a knowledge portal that is operatively associated with a plurality of data
objects and contextually links the objects based on document content, the user interface
comprising:

a means for receiving a user input;

a K-map processor for calculating a K-map corresponding to a current object and
a set of K-map parameters, the K-map identifying objects indicated by a catalog of the
knowledge portal as having first contents related to the current object;

a current object display pane for displaying at least a portion of second contents
of the current object;

a K-map display pane for displaying the K-map; and

a preview pane different from the current object display pane for displaying third
contents corresponding to a preview object.

29.   (Previously Presented)   The user interface as set forth in claim 28,
wherein:

the K-map display pane displays the K-map in a non-hierarchical node view.

30.   (Previously Presented)   The user interface as set forth in claim 28,
wherein:

the K-map processor calculates a K-map containing objects limited to objects
corresponding to the K-map class parameter.

31.   (Original)   The user interface as set forth in claim 30, wherein:

the means for receiving a user input include a pointing device selection means
operative at least within the K-map display pane; and

the class parameter is selectively updateable by the user via the pointing device selection means operating on a graphical class input dialog.

32.   (Original)   The user interface as set forth in claim 30, wherein:

the class parameter selectively takes values including a people class value, a places class value, and a things class value.

33.   (Previously Presented)   The user interface as set forth in claim 28, wherein:

the K-map processor calculates a K-map containing objects limited to objects whose relationship to the current object falls within the K-map scope parameter value.

34.   (Original)   The user interface as set forth in claim 33, wherein:

the means for receiving a user input include a pointing device selection means operative at least within the K-map display pane; and

the scope parameter is selectively updateable by the user via the pointing device selection means operating on a graphical scope input dialog.

35.   (Original)   The user interface as set forth in claim 34, wherein the graphical scope input dialog is a slider bar.

36.   (Original)   The user interface as set forth in claim 28, wherein:

the means for receiving a user input include a pointing device selection means operative at least within the K-map display pane; and

the current object is selectively updateable by the user via the pointing device selection means operating within the K-map display pane.

37.   (Previously Presented)   The user interface as set forth in claim 28, wherein:

the means for receiving a user input include a pointing device selection means operative at least within the K-map display pane; and

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the preview object is selectively updateable by the user via the pointing device selection means operating within the K-map display pane, the updating of the preview object not affecting the current display pane.

38.   (Original)   The user interface as set forth in claim 28, wherein:

the set of K-map parameters includes an object parameter, said object parameter being selectively updateable by the user; and

the K-map processor calculates a K-map containing objects related to the object corresponding to the object parameter.

39.   (Previously Presented)   The user interface as set forth in claim 38, wherein:

the means for receiving a user input include a pointing device selection means operative at least within the document display pane whereby the user selectively updates the object parameter by selecting text corresponding thereto from the second contents of the object display pane.

40.   (Previously Presented)   The user interface method as set forth in claim 7, wherein the preview pane third contents associated with the updated preview object and displayed in the preview pane are metadata stored in the knowledge portal rather than in the preview object itself.

41.   (Previously Presented)   The article of manufacture as set forth in claim 19, wherein the method further includes:

updating the K-map object to correspond to one of a group consisting of: (i) a double-clicked K-map entry, (ii) text in the document pane that is highlighted by a user, and (iii) one or more search terms entered by a user; and

updating the displayed K-map to identify at least (i) related objects having fourth contents related to the updated K-map object, and (ii) a measure of a strength of relationship between each related object and the updated K-map object.

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42.   (Previously Presented)   The user interface method as set forth in claim 1, wherein:

the K-map parameter includes at least one of a scope, a view selector, a class selector, and a K-map object parameter.

43.   (Previously Presented)   The apparatus as set forth in claim 10, wherein:

the K-map parameter includes at least one of a scope, a view selector, a class selector, and a K-map object parameter.

44.   (Previously Presented)   The user interface as set forth in claim 28, wherein:

the set of K-map parameters includes at least one of a scope, a view selector, a class selector, and a K-map object parameter.

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X.   EVIDENCE APPENDIX

NONE

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XI.   RELATED PROCEEDINGS APPENDIX

NONE

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